

# STANDARD INSPECTION REPORT OF A GAS OPERATOR FIELD AUDIT

## FIELD AUDIT

Unless otherwise noted, all code references are to 49CFR Part 192.  
If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

Operator: NRG Wholesale Generation LP	Operator ID#: 31999
Inspection Date(s): 6/9/2015 (Half)	Man Days: 0.5
Inspection Unit: NRG Wholesale Generation LP	
Location of Audit: Neoga	
Exit Meeting Contact:	
Inspection Type: Standard Inspection - Field Audit	
Pipeline Safety Representative(s): , Aaron McElravy	
Company Representative to Receive Report: Gil Smith	
Company Representative's Email Address: gil.smith@nrgenergy.com	

Headquarters Address Information:	344A RR 1 Centerline Road Neoga, IL 62447 Emergency Phone#: (866) 497-2284 Fax#:	
Official or Mayor's Name:	Donald Claybaugh Phone#: (815) 207-5870 Email: donald.claybaugh@nrg.com	
Inspection Contact(s)	Title	Phone No.
Mike Vollmering	O&M Manager (EMS)	(713) 963-7652
Gil Smith	Plant Manager	(217) 273-4332
Carol Strang	Compliance Manager (EMS)	(713) 579-7749

CUSTOMER METER & REGULATOR		Status
<b><u>Category Comment:</u></b>		
NRG does not contain customer meters and regulators, the system includes a transmission pipeline to supply gas to a generation facility.		
[192.353(a)]	Is the customer meter and regulator installed in a readily accessible location and protected from corrosion and other damage, including if installed outside a building, vehicular damage that may be anticipated?	<b>Not Applicable</b>
[192.355(b)(1)]	Is the customer regulator vent rain and insect resistant?	<b>Not Applicable</b>
[192.355(b)(2)]	Is the customer regulator vent located where gas from the vent escapes freely into the atmosphere and away from building openings?	<b>Not Applicable</b>
[192.355(b)(3)]	Is the vent protected from damage caused by submergence in areas of flooding?	<b>Not Applicable</b>

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[192.357(a)]	Is the customer meter and regulator installed to minimize anticipated stresses upon connecting piping?	Not Applicable
[192.357(d)]	Is a customer regulator that might release gas vented to the outside atmosphere?	Not Applicable
[192.359(a)]	Is the meter operating pressure within the allowable limits of the meter case rating?	Not Applicable
[192.365(a)]	Is the service line valve upstream of the regulator or meter?	Not Applicable
[192.365(c)]	Is the underground service line valve located in a curb box or standpipe that allows for ready operation?	Not Applicable
[192.727(d)][192.727(d)]	When service to the customer has been discontinued has the proper method been utilized to prevent unauthorized usage?	Not Applicable
<b>CATHODIC PROTECTION</b>		<b>Status</b>
[192.463(a)]	Is the applicable cathodic protection criteria contained in Appendix D of this part being followed?	Satisfactory
[192.465(a)]	Were pipe to soil readings taken?	Satisfactory
<b><u>General Comment:</u></b>  <i>Pipe to soil readings were obtained from the following locations.</i>  <i>West side of RR. Tracks Rt. 45 -1.147volts</i> <i>East Side of Rt. 45 -1.496volts</i> <i>700 W. &amp; 100 E. -1.515volts</i> <i>Take Point 700 W. -1.505volts</i>		
[192.465(b)]	Were rectifier installations inspected?	Not Applicable
<b><u>General Comment:</u></b>  <i>NRG does not contain or utilize a rectifier for cathodic protection.</i>		
[192.465(a)]	Were isolated mains/services tested?	Not Applicable
<b><u>General Comment:</u></b>  <i>NRG does not contain isolated sections, the pipeline is connected as a single unit.</i>		
[192.465(c)]	Were critical/non critical bonds tested?	Not Applicable
<b><u>General Comment:</u></b>  <i>NRG does not contain critical or non-critical bonds at this facility</i>		
[192.467(a)]	Is electrical isolation provided by use of insulated meter spud, valve, union, or flange?	Satisfactory
[192.467(c)]	Were casings installations tested for electrical isolation?	Not Applicable
<b><u>General Comment:</u></b>  <i>NRG does not contain casings at this location.</i>		

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[192.479(a)]	Is the above ground piping coated or painted as required?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>The facilities at the take point were free of corrosion and contained the required coatings.</i>		
[192.479(c)]	Is the pipeline free of corrosion or pitting?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>The facilities at the take point were free of corrosion and contained the required coatings.</i>		
<b>DAMAGE PREVENTION</b>		<b>Status</b>
[192.614]	Does the operator have a valid notification of planned excavation activities?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Staff reviewed locate #X0220334 during the field audit.</i>		
[265.40(a)]	Did the operator complete the locating activities in the specified timeframe?	<b>Satisfactory</b>
[192.614(c)(5)]	Were temporary markings made in accordance with the operator's Operation and Maintenance Manual?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>Staff reviewed the ticket and location of the proposed excavation, the operator reviewed maps and records and made contact with the contractor and determined no dig interference.</i>		
[192.707(a)(1)]	Are line markers placed and maintained as close as practical over each buried main and transmission line located at each crossing of a public road and railroad?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Line Markers were inspected for placement and labeling requirements at the following locations.</i>  <i>West and East side of railroad tracks</i> <i>West and East side of Rt. 45</i> <i>Interstate 57</i> <i>West and East side of 700 W. &amp; 100 E</i>		
[192.707(a)(2)]	Are line markers placed and maintained as close as practical over each buried main and transmission line located wherever necessary to identify the location of the transmission line or main to reduce the possibility of damage or interference?	<b>Satisfactory</b>
[192.707(c)]	Are line markers placed and maintained as close as practical over each main and transmission line located above ground?	<b>Satisfactory</b>
[192.707(d)(1)]	Do the operator's line markers contain the following information: The following must be written legibly on a background of sharply contrasting color on each line marker: The word "Warning," "Caution," or "Danger" followed by the words "Gas (or name of gas transported) Pipeline" all of which, except for markers in heavily developed urban areas, must be in letters at least 1 inch (25 millimeters) high	<b>Satisfactory</b>

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	with ¼ inch (6.4 millimeters) stroke?	
[192.707(d)(2)]	Do the operator's line markers contain the following information: The following must be written legibly on a background of sharply contrasting color on each line marker: The name and phone number (including area code) of the operator where the operator can be reached at all times?	<b>Satisfactory</b>
<b>PRESSURE LIMITING AND REGULATING DEVICES (MECHANICAL)</b>		<b>Status</b>
[192.739(a)(4)]	Was each pressure limiting station, relief device (except rupture discs), and pressure regulating station and its equipment subjected at intervals not exceeding 15 months, but at least once each calendar year, to inspections and tests to determine that it is properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation.?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>NRG does not contain pressure regulating equipment at this location, NRG maintains a higher MAOP than the supplier downstream of the Take Point. The supplier utilizes a flow controller to adjust flow volumes when the facility is online, during the audit the facility was in operation and operating pressure was 704psig.</i>		
[192.317(b)]	Is each above ground transmission line or main protected from accidental damage by vehicular traffic or other similar causes?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>All above ground piping was in a secure location away from vehicular traffic.</i>		
[192.741(a), 192.741(c)]	Were telemetering and/or recording gauges inspected for abnormally high or low pressure indications?	<b>Satisfactory</b>
[192.743(a)]	Is overpressure protection provided on the pipeline down stream of the take point?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>NRG maintains a higher MAOP than the supplier.</i>		
[192.199(d)]	Were the pressure relief or pressure limiting devices inspected to determine if the support was made of noncombustible material?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>NRG does not contain pressure regulating equipment at this location.</i>		
[192.199(e)]	Were the pressure relief or pressure limiting devices inspected to determine if the discharge stacks, vents, or outlet ports were designed to prevent accumulation of water, ice, or snow, and located where gas can be discharged into the atmosphere without undue hazard?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>NRG does not contain pressure regulating equipment at this location.</i>		
[192.199(h)]	Was each valve, designed to isolate the system under protection from its source of pressure, secured to prevent unauthorized operation of any stop valve that will make the pressure relief valve or pressure limiting device inoperative?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		

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*The valve at the take point was in a secured location and locked to prevent unauthorized operation.*

VALVE MAINTENANCE		Status
[192.747(a)]	Were the valves readily accessible and was the operator able to access the valve with the appropriate valve wrench?	Not Applicable

**General Comment:**

*NRG does not contain distribution valves at this location.*

ODORIZATION OF GAS		Status
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**Category Comment:**

*NRG's transmission pipeline does not contain odorized gas at this location, the transmission pipeline is located in a class 1 area.*

[192.625(a)]	Was the odor intensity level readily detectable at or below 1/5th LEL?	Not Applicable
[192.625(e)]	Was the Odorization equipment and tank levels inspected?	Not Applicable
[192.625(f)]	Was the operator's equipment calibrated as required?	Not Applicable

TRANSMISSION		Status
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[192.179(b)(1)]	Are transmission valves protected from tampering or damage?	Satisfactory
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**General Comment:**

*Staff inspected the valve at the take point, the valve is protected from damage, accessible and locked to prevent unauthorized usage.*

[192.745(a)]	Were the valves inspected accessible?	Satisfactory
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**General Comment:**

*Staff inspected the valve at the take point, the valve is protected from damage, accessible and locked to prevent unauthorized usage.*

[192.719(a)]	Is pre-tested transmission pipe inventory maintained for use in an emergency?	Not Applicable
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**General Comment:**

*The operator indicated no pre-tested transmission pipe was stored at this facility.*

[192.179(c)]	If blow down activities were observed, were the blow down valves properly sized to allow the transmission pipeline to vent as rapidly as practicable and did the blow down vent freely to atmosphere away from any hazards?	Not Applicable
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**General Comment:**

*During the audit no blow down activities were being conducted.*

MARKING OF MATERIAL		Status
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[192.63(a)]	Does the operator's components and pipe contain the required markings?	Satisfactory
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**General Comment:**

*The facilities listed contained the required markings.*

OPERATOR QUALIFICATION		Status
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Was a PHMSA Form 15 Operator Qualification Field Inspection Protocol Form completed?	<b>No</b>
<b><u>General Comment:</u></b> <i>PHMSA Form 15 was not completed during the field audit.</i>	

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